

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

vs.

MINDGEEK S.A.R.L. a foreign  
entity; MG FREESITES, LTD., a  
foreign entity; MINDGEEK USA  
INCORPORATED, a Delaware  
corporation; MG PREMIUM LTD, a  
foreign entity; MG GLOBAL  
ENTERTAINMENT INC., a  
Delaware corporation; 9219-1568  
QUEBEC, INC., a foreign entity;  
BERND BERGMAIR, a foreign  
individual; FERAS ANTOON, a  
foreign individual; DAVID  
TASSILLO, a foreign individual;  
VISA INC., a Delaware corporation;  
REDWOOD CAPITAL  
MANAGEMENT, LLC, a Delaware  
limited liability company;  
REDWOOD DOE FUNDS 1-7;  
COLBECK CAPITAL  
MANAGEMENT, LLC, a Delaware  
company, COLBECK DOE FUNDS  
1-3,

Defendants.

CASE NO. 2:24-cv-04786-WLH-ADS

**[PROPOSED] ORDER GRANTING  
APPLICATION FOR LEAVE TO  
FILE UNDER SEAL REDWOOD  
CAPITAL MANAGEMENT, LLC'S  
OMNIBUS MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT OF MOTION TO  
DISMISS COMPLAINTS IN  
RELATED CASES**

1 On October 30, 2024, Defendant Redwood Capital Management, LLC,  
2 (“Redwood” or “Defendant”) filed an Application for Leave to File Under Seal  
3 Redwood Capital Management, LLC’s Omnibus Memorandum of Points and  
4 Authorities in Support of Motion to Dismiss Complaints in Related Cases (the  
5 “Application”) in this matter pursuant to Local Rule 79-5.2.2.

6 The Court, having considered all papers filed in support of and in opposition  
7 to Redwood’s Application and all other pleadings and papers on file herein, **IT IS**  
8 **HEREBY ORDERED** that Defendant’s Application is **GRANTED**.

9  
10 **IT IS ORDERED THAT:**

11 The unredacted version of Redwood Capital Management, LLC’s Omnibus  
12 Memorandum of Points and Authorities in Support of Motion to Dismiss Complaints  
13 in Related Cases is to be filed under seal.  
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17 Dated:

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18 HON. WESLEY L. HSU  
19 UNITED STATES DISTRICT JUDGE  
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